

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

DONNA K. SOUTTER and TONY L. WEBB,  
on behalf of themselves and  
those similarly situated,

Plaintiffs,

v.

Civil Action No. 3:10CV00107(REP)

EQUIFAX INFORMATION SERVICES LLC,

Defendant.

**DECLARATION OF ALICIA FLUELLEN**

I, Alicia Fluellen, hereby make this Declaration under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am aware that Equifax Information Services LLC ("Equifax") is a defendant in the above-styled lawsuit. I submit this Declaration in support of Equifax's Motion to Transfer Venue or, in the Alternative, Motion to Sever the claims of Plaintiff Tony L. Webb.

2. I have reviewed Plaintiffs' Amended Complaint and am generally familiar with the allegations made therein.

3. I reside and work in Atlanta, Georgia. My business address is 1100 Abernathy Road, Suite 100, Atlanta, Georgia. I am over 21 years of age, have personal knowledge of the matters contained herein and am otherwise competent to provide this declaration.

4. I am currently employed as the Director of Consumer Customer Care for Equifax and have authority to submit this declaration on its behalf

5. Equifax is a Georgia limited liability company with its principal place of business in Atlanta, Georgia.

6. Equifax's headquarters are located at 1550 Peachtree Street, Atlanta, Georgia. Equifax's Consumer Center is located at 1100 Abernathy Road, Suite 100, Atlanta, Georgia.

7. Based upon Equifax's investigation, Plaintiff Tony Lee Webb currently resides at 2430 Avalon Avenue NW in Roanoke, Virginia 24012.

8. Equifax knows of no witnesses with knowledge of the allegations in the Complaint who reside and/or work within the geographical boundaries of the Richmond Division.

9. The Equifax employees who would testify regarding the underlying factual allegations in this case, such as the investigation of Plaintiff's credit disputes and Equifax's policies and procedures, are all located in Atlanta, Georgia.

Pursuant to 28 U.S.C. §1746 and the laws of the United States of America, I further declare under penalty of perjury that the foregoing is true and correct.

Executed this 4 day of May, 2010, at Atlanta, Georgia.

By:   
Alicia Fluellen